



Department of Energy

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JUN 01 1993



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93-DOE-06504

Mr. Martin Hestmark
U.S. Environmental Protection Agency, Region VIII
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Mr. Gary Baughman
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Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

Please find enclosed your copies of the response to Colorado Department of Health (CDH) comments on the Revised Work Plan (WP) for Operable Unit No. 13 (OU13) submitted March 10, 1993, and your requested replacement pages for that document.

The Revised OU13 Work Plan submitted to the regulatory agencies March 10, 1993, was rejected pending the resolution of one major and two very minor issues:

- Surficial Soils Sampling Plan;
- Clarification of the radiological survey in paved areas; and
- Delineation of the groundwater plume.

DOE strongly disagrees with CDH's proposed Soils Sampling Plan. CDH's April 26, 1993 letter, criticized DOE's statistical approach as not valid to meet the Stage 1 data quality objectives (DQOs). In particular, the number of surficial soil samples was deemed insufficient. CDH would require 25 samples per individual hazardous substance site (IHSS). To support this, the OU10 Surficial Soils Sampling Plan was photocopied and then the same coefficient of variation was assumed and it was based on the historical information available from OU10, to achieve the desired number of samples. Then the number of samples at some of the smaller IHSSs was reduced "based on professional judgment." To be valid, this approach must have historical data on which to calculate a coefficient of variation, but there is no historical data available from OU13 on which to base any assumptions or statistics. Any methodology must be rigorously applied, not amended arbitrarily. OU10 data cannot be used to generate OU13 statistics.

The methods in the Revised Work Plan are based on DOE's SAFER (observational) approach, meet the Stage 1 DQOs, are statistically sound, and can be performed within current budgets and schedules.

ADMIN RECORD

A-OU13-000104

M. Hestmark & G. Baughman
93-DOE-02992

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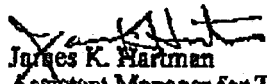
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The other two comments are minor and are easily resolved. DOE has clearly stated that the HPGe is reliable only for the measurement of surface radionuclides and has committed to delineate any plumes of groundwater contamination if they are discovered. DOE has made the appropriate changes to the Work Plan.

DOE believes all previous versions of the Work Plan were submitted in good faith based on the best available information and were approvable. A great number of very thorny issues such as the revision of the Benchmark tables have been resolved. The only real issue that remains is the Surficial Soils Sampling Plan. If your technical staff still disagrees with our approach, we suggest a meeting to resolve the statistical issues as soon as possible.

If you have any questions, please feel free to contact Robert Birk of my staff at 966-5921.

Sincerely,


James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

Enclosure

cc w/Enclosure:

A. Rampertaap, EM-453
B. Brainard, OPA, RFO
B. Magee, HAZWRAP

cc w/o Enclosure:

R. Benedetti, EG&G
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